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ROBERT HUNTER BIDEN

16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA  
18 WESTERN DIVISION

19 ROBERT HUNTER BIDEN, an  
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,  
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**DECLARATION OF ZACHARY C.  
HANSEN IN SUPPORT OF  
PLAINTIFF ROBERT HUNTER  
BIDEN'S *EX PARTE*  
APPLICATION TO SEAL THE  
JOINT STATEMENT OF  
UNRESOLVED DISCOVERY  
ISSUES AND EXHIBITS 1-6 & A-L  
(DKT. # 76 THROUGH 76-18) AND  
REPLACE WITH REDACTED  
VERSIONS**

*Filed concurrently with Ex Parte  
Application and [Proposed] Order*

Date: October 4, 2024  
Time: 9:00 AM

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Ctrm.: 580

Judge: Hon. Patricia A. Donahue,  
Ctrm. 580



**DECLARATION OF ZACHARY C. HANSEN**

I, Zachary C. Hansen, declare and state as follows:

1. I am an Associate within the law firm of Early Sullivan Wright Gizer & McRae LLP, attorneys of record for PLAINTIFF ROBERT HUNTER BIDEN herein. I submit this declaration in support of Plaintiff's Ex Parte Application. If called as a witness, I would and could testify to the matters contained herein.

2. Pursuant to Central District Local Rule 7-19.1 I made a reasonable, good faith effort to advise counsel for Defendant Patrick Byrne ("Defendant") of the date and substance of the instant Application on October 2, 2024. On October 3, 2024, Defendant's counsel informed me that Defendant would join in the requested relief sought by the instant *ex parte* application.

3. Defendant's counsel marked Exhibit L "Highly Confidential and to be Filed Under Seal" (Dkt. # 76-18) because, according to Defendant's counsel, it contains information relating to Defendant's location, which is highly sensitive information because Defendant claims his life is at risk. Furthermore, references were made to Defendant's location in the Statement and in the other various Exhibits thereto.

4. Due to confusion on my part, the Statement, including Exhibit L, were inadvertently filed in unredacted form.

5. A true and correct copy of the redaction version of the Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted version at Docket No. 76, is attached hereto as **Exhibit A**.

6. A true and correct copy of the redaction version of the "Exhibit 1" to the Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted version at Docket No. 76-1, is attached hereto as **Exhibit B**.

7. A true and correct copy of the redaction version of the "Exhibit 2" to the Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted version at Docket No. 76-2, is attached hereto as **Exhibit C**.

1           8.     A true and correct copy of the redaction version of the “Exhibit 3” to the  
2 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
3 version at Docket No. 76-3, is attached hereto as **Exhibit D**.

4           9.     A true and correct copy of the redaction version of the “Exhibit 4” to the  
5 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
6 version at Docket No. 76-4, is attached hereto as **Exhibit E**.

7           10.    A true and correct copy of the redaction version of the “Exhibit 5” to the  
8 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
9 version at Docket No. 76-5, is attached hereto as **Exhibit F**.

10          11.    A true and correct copy of the redaction version of the “Exhibit 6” to the  
11 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
12 version at Docket No. 76-6, is attached hereto as **Exhibit G**.

13          12.    A true and correct copy of the redaction version of the “Exhibit A” to the  
14 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
15 version at Docket No. 76-7, is attached hereto as **Exhibit H**.

16          13.    A true and correct copy of the redaction version of the “Exhibit B” to the  
17 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
18 version at Docket No. 76-8, is attached hereto as **Exhibit I**.

19          14.    A true and correct copy of the redaction version of the “Exhibit C” to the  
20 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
21 version at Docket No. 76-9, is attached hereto as **Exhibit J**.

22          15.    A true and correct copy of the redaction version of the “Exhibit D” to the  
23 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
24 version at Docket No. 76-10, is attached hereto as **Exhibit K**.

25          16.    A true and correct copy of the redaction version of the “Exhibit E” to the  
26 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
27 version at Docket No. 76-11, is attached hereto as **Exhibit L**.

28          17.    A true and correct copy of the redaction version of the “Exhibit F” to the

1 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
2 version at Docket No. 76-12, is attached hereto as **Exhibit M**.

3 18. A true and correct copy of the redaction version of the “Exhibit G” to the  
4 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
5 version at Docket No. 76-13, is attached hereto as **Exhibit N**.

6 19. A true and correct copy of the redaction version of the “Exhibit H” to the  
7 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
8 version at Docket No. 76-14, is attached hereto as **Exhibit O**.

9 20. A true and correct copy of the redaction version of the “Exhibit I” to the  
10 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
11 version at Docket No. 76-15, is attached hereto as **Exhibit P**.

12 21. A true and correct copy of the redaction version of the “Exhibit J” to the  
13 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
14 version at Docket No. 76-16, is attached hereto as **Exhibit Q**.

15 22. A true and correct copy of the redaction version of the “Exhibit K” to the  
16 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
17 version at Docket No. 76-17, is attached hereto as **Exhibit R**.

18 23. A true and correct copy of the redaction version of the “Exhibit L” to the  
19 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted  
20 version at Docket No. 76-18, is attached hereto as **Exhibit S**.

21 I declare under penalty of perjury under the laws of the United States of  
22 America that the foregoing is true and correct. Executed on this 3rd day of October,  
23 2024, at Los Angeles, California.

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25  
26 /s/ Zachary C. Hansen

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28 Zachary C. Hansen